Paul Dabbs Statewide Planning Branch California Department of Water Resources P.O. Box 942836 Sacramento, CA 94236-0001

Dear Paul:

I have a serious concern about a recommendation in the Urban Water Use Efficiency section of Chapter Five in the latest draft of The California Water Plan Update. In the terminology that the Advisory Committee has been using in our recent discussions, this recommendation is a showstopper.

On page 174, the draft recommends the creation of "'California Friendly Landscapes,' landscapes that thrive with minimal or no supplemental irrigation."

This section could be read to mean that California should forbid the vast majority of plants that currently grace our urban landscapes and parks. Such a recommendation would be anathema to the green industry, the business community, and urban residents everywhere.

This recommendation appeared in the document only in the last week or two. In fact, it appeared so recently that I did not address it last Monday when I had an opportunity to submit comments to the Urban Caucus. Instead, I addressed some other relatively minor issues, as I was relying on a previous draft that I had downloaded only a few days earlier.

Hence, this letter to you.

In the previous drafts of the Urban Water Use Efficiency section, the recommendation was worded as follows: "Create a 'California Friendly Landscape.' Irrigate landscapes efficiently at xx percent of ETo or less through landscape design, installation, management and maintenance practices including plant selection, irrigation scheduling, landscape audits, dedicated irrigation meters, weather driven timers, etc."

I prefer this original wording, although my ultimate support for it is contingent on the number we use for the reference evapotranspiration percentage. This original wording makes it clear that there are many ways to conserve water when it comes to landscaping. It does not imply that the state of California should take an absurd zero or near-zero irrigation position when it comes to landscapes and parks.

I am perplexed as to how the current wording found its way into the current draft. I believe I attended every minute of every work group meeting on Urban Water Efficiency, but I have no recollection of any serious discussion about either a zero or near-zero irrigation policy for landscapes

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and parks, or the removal of the water efficiency target. I attended most of the Urban Caucus meetings, and I don't recall anyone making those proposals in that forum either. I did find it curious, however, that in neither forum did we have a discussion about what the ETo percentage should be.

In conclusion, I suggest that we do one of two things:

• Go back to the original wording if we want to set a realistic water efficiency target.

or

• Delete the first sentence of the current two-sentence recommendation.

If we choose the first option, we should have a discussion about what the ETo percentage should be as soon as possible.

Thank you for considering these comments.

Yours sincerely,

LARRY ROHLFES, CAE Assistant Executive Director

cc: Kamyar Guivetchi Greg Weber Urban Caucus Business Caucus